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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MICHAEL J. FLYNN, and PHILIP
STILLMAN,

Case No.: 3:19-cv-239-MMD-CLB

**STIPULATION AND PROPOSED ORDER
EXTENDING TIME FOR DEFENDANTS TO
FILE A MOTION REGARDING PLAINTIFFS'
ASSERTION OF PRIVILEGE**

FIRST REQUEST

MICHAEL E. LOVE, an individual;
JACQUELYNE LOVE, an individual;
MICHAEL E. LOVE as TRUSTEE OF THE
MICHAEL LOVE FAMILY TRUST;
MELECO, INC., a Nevada corporation; and
DOES 1-10

Defendants.

Plaintiffs Michael J. Flynn and Philip Stillman (“Plaintiffs”), appearing *pro se*, and Defendants Michael Love, individually and as trustee of the Michael Love Family Trust, Jacquelyne Love, and Meleco, Inc. (collectively, “Defendants”) by and through their attorneys of

1 record, the law firm Greenberg Traurig, LLP, hereby stipulate and request that Defendants' have
 2 up to, and including, August 27, 2021 by which to file any motion regarding Plaintiffs' assertion
 3 of privilege. This stipulation is made and based upon the following:

4 1. At the June 28, 2021 case management conference, the Court addressed Plaintiffs'
 5 assertion of privilege over certain documents and communications and the corresponding privilege
 6 log requirements. In particular, the Court ordered plaintiffs to provide said log no later than July
 7 29, 2021 and Defendants to file any motion challenging the same within 14 days of receipt. ECF
 8 No. 150 at pg. 2 (Order).

9 2. Mr. Stillman has provided a log, however the parties are working through issues
 10 concerning its readability and hope to resolve those without Court intervention.

11 3. Accordingly, the parties hereby stipulate and request that the time by which
 12 Defendants must file a motion, if any, regarding Plaintiffs' assertion of privilege and attendant log
 13 be extended to **August 27, 2021**.

14 4. This is the first request for an extension of time and is made in good faith, not for
 15 purposes of delay.

16 IT IS SO STIPULATED.

17 Dated this 10th day of August 2021.

18 Dated this 10th day of August 2021.

19 **GREENBERG TRAURIG, LLP**

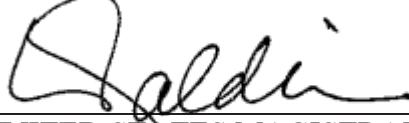
20 _____
 /s/ *Philip Stillman*
 MICHAEL J. FLYNN, ESQ.
 Appearng Pro Se
 PHILIP STILLMAN, ESQ.
 Appearng Pro Se

21 Plaintiffs

22 _____
 /s/ *Jason Hicks*
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 JASON K. HICKS, ESQ.
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 VINCENT H. CHIEFFO
Admitted Pro Hac Vice

23 Attorneys for Defendants

24 **IT IS SO ORDERED.**



25 _____
 UNITED STATES MAGISTRATE JUDGE

26 Dated this 11th day of August 2021.